

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas

## UNITED STATES DISTRICT COURT

FILED

OCT 15 2019.

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Maria Guadalupe SIERRA  
YOB: 1995, COC: US

Case No. M-19-2503-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 USC 952

Knowingly and intentionally attempt to import into the United States from the United Mexican States approximately 53.82 of Methamphetamine, Schedule II controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 53.82 kilograms of Methamphetamine, Schedule II controlled substance.

21 USC 841

This criminal complaint is based on these facts:

✓ Continued on the attached sheet.

Approved by AUSA J. DIPIAZZA 10/15/19 7:54am

J. DiPiazza

Complainant's signature

Gerardo Mercado, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/15/2019City and state: McAllen, Texas

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

## ATTACHMENT A

- I. On October 14, 2019, at approximately 10:25 a.m., U.S. Customs and Border Protection Officers (CBPOs) encountered Maria Guadalupe SIERRA, a United States citizen, driving a black Ford Explorer (hereinafter referred to as "Subject Vehicle") as she presented herself for entry inspection at the Hidalgo, Texas Port of Entry (POE).
- II. At the primary inspection area, SIERRA provided the inspecting CBPO with a negative customs declaration. SIERRA and the Subject Vehicle were referred to the secondary inspection after providing an abnormal travel itinerary and displaying nervous physical behaviors to the CBPO.
- III. At the secondary inspection area, CBPOs conducted an inspection of the Subject Vehicle utilizing non-intrusive technology equipment and identified anomalies to the fuel tank area within the Subject Vehicle. Subsequently, CBPOs discovered approximately suspected Methamphetamine, weighing approximately 53.82 kilograms, concealed within the fuel tank of the Subject Vehicle. CBPOs field tested the liquid substance with signs of crystallization discovered within the fuel tank which yielded positive for characteristics of Methamphetamine.
- IV. In a post-Miranda interview, SIERRA admitted to Homeland Security Investigations (HSI) Special Agents (SAs) and CBPOs that she had recently been recruited by co-conspirators to smuggle an unknown illegal substance from Mexico into the United States for financial gain. SIERRA intended to drive the Subject Vehicle from Reynosa, Mexico to a location near Houston, Texas and deliver the Subject Vehicle to other co-conspirators. SIERRA admitted she had previously smuggled contraband from Reynosa, Mexico to Houston, Texas.